

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:21-cv-814

LARISSA HARPER HAIRGROVE,)
)
)
Plaintiff,)
)
v.)
)
CITY OF SALISBURY, DOWNTOWN)
SALISBURY, INC. and LANE BAILEY,)
In his individual and official capacity,)
)
Defendants.)
_____)

**DEFENDANT DOWNTOWN SALISBURY, INC.'S MOTION
FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Civil Rule 6.1, Defendant Downtown Salisbury, Inc. ("DSI"), through counsel and with the consent of Plaintiff's counsel, respectfully moves this Court for an extension of time within which to answer or otherwise respond to the Plaintiff's Complaint (Doc. No. 1-1) filed in this matter. In support of this Motion, DSI shows unto the Court the following:

1. The deadline for DSI to answer or otherwise respond to the Plaintiff's Complaint has not yet expired. The Court has not granted DSI any prior extensions to respond to Plaintiff's Complaint.
2. DSI's counsel has had some unexpected scheduling issues arise that will prevent him from being able to complete and file responsive pleadings by the current deadline of January 9.

3. The undersigned has conferred with Plaintiff's counsel regarding his need for additional time and Plaintiff's counsel has consented to an extension through and including January 20, 2022 for DSI to file its responsive pleadings.

4. The undersigned certifies that this Motion is made in good faith for the reasons set forth herein, and not for the purposes of undue delay.

WHEREFORE, DSI respectfully requests that the Court grant it an extension of time through and including January 20, 2022 within which to answer or otherwise respond to the Plaintiff's Complaint.

This the 5th day of January, 2022.

s/G. Bryan Adams, III
G. Bryan Adams, III (N.C. Bar No. 17307)
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**ATTORNEYS FOR DEFENDANT DOWNTOWN
SALISBURY, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this Motion for Extension of Time to File Responsive Pleadings with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following counsel of record for the Plaintiff as follows:

Valerie Bateman
NEW SOUTH LAW FIRM
209 Lloyd Street, Ste 350
Carrboro, NC 27510
Email: valerie@newsouthlawfirm.com

Rachel Blunk
FORREST FIRM, P.C.
3211 Shannon Road, Suite 100
Durham, NC 27707
Email: Rachel.blunk@forrestfirm.com

and to counsel for Defendants City of Salisbury and Lane Bailey as follows:

Patrick Flanagan
Cranfill Sumner LLP
2907 Providence Road, Suite 200
Charlotte, NC 28211
Email: phf@cshlaw.com

This 5th day of January, 2022.

s/G. Bryan Adams, III
G. Bryan Adams, III
N.C. Bar No. 17307
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